

Exhibit 1

From: Melanie.Blunsch@lw.com
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Subject: RE: DZ Reserve v. Meta
Date: Thursday, July 17, 2025 9:09:25 PM
Attachments: [image001.png](#)

Hi Geoff,

Thanks for reaching out – we have been thinking about this on our end as well, especially since we'll need to figure out amongst ourselves quite a few exchanges to get aligned ahead of the various Court-ordered deadlines. To facilitate that, we tried to work backwards from those dates to rough out a schedule for the exchange of pretrial materials and additional meet and confers that aligns with Judge Donato's instructions to the parties and standing orders. For some of the joint submissions, we think it makes sense for plaintiffs to send us their portions of the pretrial materials first (especially plaintiffs' case comes first, and ours needs to be responding to you all), but we've in turn offered to take the first crack at jury instructions and verdict forms.

Below is what we've roughed out but happy to discuss further and adjust to make this all as smooth as possible. Exciting to be getting this to trial soon!

- July 28 or 29
 - Meet and confer re: plans for joint submissions and potential motions in limine.
- July 31: Plaintiffs send proposed Joint Pretrial Statement based on Judge's standing order, proposed exhibit list, and witness list.
- August 7: Meta sends Plaintiffs draft jury instructions and verdict forms pursuant to Judge Donato's standing orders.
- August 14:
 - Meta sends edits/additions to the Joint Pretrial Statement, including its witness list and additions to the exhibit list.
 - Plaintiffs send revisions to draft jury instructions and verdict forms.
- Week of August 14: Parties meet and confer about potential motions in limine (to see where we can reach agreement ex ante and where we need to draft up the MILs)
- August 21: Per Court order, Parties exchange, but do not file, MILs.
- August 23-25: Parties meet and confer about whether any MILs can be narrowed or avoided
- August 27: Parties exchange objections to each other's exhibits and proposed voir dire questions
- August 28: First Pretrial Conference 1:30 pm

- August 29:
 - Per Court order, Parties exchange, but do not file, oppositions to MILs.
 - Parties exchange initial deposition designations.
- September 4: Per Court order, Parties file all pretrial materials (other than deposition designations).
- Week of September 8: Meet and confer regarding exhibit list and deposition designation (likely multiple meet and confer sessions by zoom)
- September 15: Parties exchange objections to initial deposition designations and counter-designations.
- September 18: Final Pretrial Conference at 1:30 pm
- September 22: Parties exchange objections to deposition counter-designations.
- October 9: Per Court order, file all excerpts of deposition testimony or other discovery responses, and objections, that will be offered by any party at trial for any reason other than impeachment or rebuttal (5 days before trial).

Best,

Melanie

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From: Geoffrey Graber <GGraber@cohenmilstein.com>

Sent: Wednesday, July 9, 2025 5:13 PM

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Subject: DZ Reserve v. Meta

Counsel:

As you are aware, the Court's Standing Order requires the parties to meet and confer regarding various pre-trial matters no later than August 5, 2025. We are available for a meet and confer July 24 and 25, or the week of July 28 – August 1. Please let us know what dates work for you. To ensure a productive meeting, we believe that the parties should, to the extent possible, exchange drafts of the pretrial filings, e.g., exhibit lists and witness lists, ahead of the meet and confer. Please let us know if you are agreeable to this

approach and, if so, what we can expect to see from you in advance of the meet and confer.

Separately, we believe the Court will expect the parties to submit a joint statement in advance of the Court's first pre-trial conference scheduled for September 18. Let's discuss a schedule to exchange portions of that joint statement and an agreed upon filing date.

We ask that you please provide us with a response to this email by this Friday, July 11. Also, if you prefer, we can hop on a quick call to discuss.

-Geoff

Geoffrey Graber

Partner

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